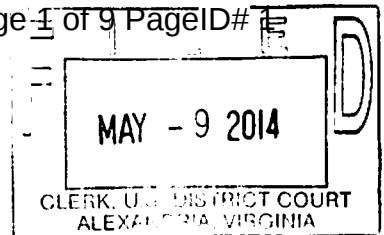


**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**



BRIAN TAYLOR,

Plaintiff,

v.

GC SERVICES, LIMITED PARTNERSHIP,

Defendant.

Civil Action No. 1:14-cv-530
CMH/TRJ

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1441 and 1446, Defendant GC Services, Limited Partnership (“GC Services”), by counsel, hereby removes this action from the General District Court of Loudoun County, Virginia (the “State Court”) to the United States District Court for the Eastern District of Virginia, Alexandria Division. Removal is proper, because this Court has subject matter jurisdiction over the removed action. The removed action implicates questions of federal law under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (the “FDCPA”).

BACKGROUND

1. On March 20, 2014, Plaintiff Brian Taylor (“Plaintiff”) filed a Warrant in Debt against GC Services, in the State Court, Case No. GV14001917 (the “Removed Action”). Copies of the Summons and Warrant in Debt are attached hereto as Exhibit A. Plaintiff’s claims appear to arise out of alleged violations of the FDCPA.

2. On April 11, 2014, GC Services’ registered agent received a copy of the Summons and Warrant in Debt by personal service.

3. Plaintiff’s Warrant in Debt asserts the following cause of action:

“FDCPA Violation.”

BASIS FOR REMOVAL

4. GC Services denies the allegations in the Warrant in Debt, denies that Plaintiff states a claim for which relief may be granted, and denies that Plaintiff sustained legally recoverable damages. Nevertheless, assuming for jurisdictional purposes only that Plaintiff's claim is valid, Plaintiff could have originally filed his Warrant in Debt in this Court pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1692. Removal, therefore, is proper under 28 U.S.C. § 1441.

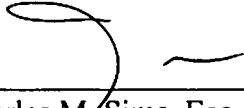
5. This Court has original jurisdiction pursuant to 28 U.S.C. § 1331 over the Removed Action because Plaintiff asserts a claim involving a question that will require resolution of significant, disputed issues of federal law, for alleged violations of the FDCPA. Plaintiff alleges that GC Services violated the FDCPA and seeks an award of damages available under the relevant federal statutes. To determine whether Plaintiff's claim is valid, the Court will necessarily have to decide whether the Defendant violated the statute. Accordingly, the outcome of this case depends upon substantial questions of federal law and qualifies for federal question jurisdiction. *See Grable & Sons Metal Prods. v. Darue Eng'g & Mfg.*, 545 U.S. 303, 312 (2005)(federal question jurisdiction exists if resolution of claims depends on significant questions of federal law).

6. Pursuant to 28 U.S.C. § 1446(d), written notice of removal of this action has been served on Plaintiff, and a Notice of Filing of Removal to Federal Court is simultaneously being filed with the Clerk of the State Court. A true copy of the Notice of Filing of Removal is attached hereto as Exhibit B.

WHEREFORE, Defendant GC Services, Limited Partnership, by counsel, hereby removes the above-referenced action now pending against it in the General District Court of Loudoun County, Virginia to this United States District Court.

Dated: May 9, 2014

Respectfully Submitted,

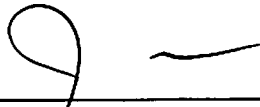


Charles M. Sims, Esq. (VSB No. 29906)
John "Jack" M. Robb, III (VSB No. 73365)
LeClairRyan, A Professional Corporation
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
Telephone: (804) 915-4138
Facsimile: (804) 916-7238
charles.sims@leclairryan.com
john.robb@leclairryan.com
Counsel for Defendant GC Services, LP


CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of May, 2014, I caused a copy of the foregoing Notice of Filing Removal to Federal Court to be served by first class U.S. Mail, postage pre-paid, on the following:

Thomas R. Breeden, Esquire
Thomas R. Breeden, PC
10326 Lomand Drive
Manassas, VA 20109
(703) 361-9277 Phone
(703) 257-2259 Fax
Counsel for Plaintiff



John "Jack" M. Robb, III (VSB No. 73365)
LeClairRyan, A Professional Corporation
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
Telephone: (804) 915-4138
Facsimile: (804) 916-7238
charles.sims@leclairryan.com
john.robbs@leclairryan.com
Counsel for Defendant GC Services, LP

 CT Corporation

**Service of Process
Transmittal**

04/11/2014

CT Log Number 524753448

TO: JOSEPH VANNEST
G C Services Corp.
6330 Gulfport St
Houston, TX 77081

RE: Process Served in Virginia

FOR: GC Services Limited Partnership (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:	Brian Taylor, Pltf. vs. G C Services Limited Partnership, Dft. <i>Name discrepancy noted.</i>
DOCUMENT(S) SERVED:	Warrant in Debt, Return Form
COURT/AGENCY:	Loudoun County General District Court, VA Case # GV14001917
NATURE OF ACTION:	FDCPA Violation - Seeking \$1000.00
ON WHOM PROCESS WAS SERVED:	C T Corporation System, Glen Allen, VA
DATE AND HOUR OF SERVICE:	By Process Server on 04/11/2014 at 10:25
JURISDICTION SERVED :	Virginia
APPEARANCE OR ANSWER DUE:	05/21/2014 at 10:00 a.m.
ATTORNEY(S) / SENDER(S):	Thomas R. Breeden, PC 10326 Lomond Drive Manassas, VA 20109 703-361-9277
ACTION ITEMS:	CT has retained the current log, Retain Date: 04/11/2014, Expected Purge Date: 04/16/2014 Image SOP Email Notification, Veronica Sanchez VERONICA.SANCHEZ@GCSERV.COM Email Notification, JOSEPH VANNEST JOE.VANNEST@GCSERV.COM
SIGNED:	C T Corporation System
PER:	Lisa Uttech
ADDRESS:	4701 Cox Road Suite 285 Glen Allen, VA 23060
TELEPHONE:	804-217-7255

EXHIBIT A

Page 1 of 1 / RM

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

WARRANT IN DEBT (CIVIL CLAIM FOR MONEY)

Commonwealth of Virginia VA CODE § 16.1-79

Loudoun

CITY OR COUNTY

General District Court

18 E. Market Street

Leesburg VA 20176
STREET ADDRESS OF COURT

TO ANY AUTHORIZED OFFICER: You are hereby commanded to summon the Defendant(s).

TO THE DEFENDANT(S): You are summoned to appear before this Court at the above address on

May 21, 2014

RETURN DATE AND TIME

10:00 am to answer the Plaintiff(s)' civil claim (see below)

DATE ISSUED

[] CLERK

[X] DEPUTY CLERK

[] MAGISTRATE

CLAIM: Plaintiff(s) claim that Defendant(s) owe Plaintiff(s) a debt in the sum of

\$ 1000.00 net of any credits, with interest at 6.0000% from date of 12/21/2012 until paid,

\$ 56.00 costs and \$ Reasonable attorney's fees with the basis of this claim being

[] Open Account [] Contract [] Note [X] Other (EXPLAIN)

FDCPA violation

HOMESTEAD EXEMPTION WAIVED? [] YES [] NO [] cannot be demanded

March 20, 2014

DATE

[] PLAINTIFF

[] PLAINTIFF'S ATTORNEY

[] PLAINTIFF'S EMPLOYEE/AGENT

CASE DISPOSITION

JUDGMENT against [] named Defendant(s) []

for \$ net of any credits, with interest at % from date

of until paid, \$ costs and \$ attorney's fees

HOMESTEAD EXEMPTION WAIVED? [] YES [] NO [] CANNOT BE DEMANDED

[] JUDGMENT FOR [] NAMED DEFENDANT(S) []

[] NON-SUIT [] DISMISSED

Defendant(s) Present? [] YES

[] NO

DATE

JUDGE

FORM DC-412 (PAGE ONE OF TWO) 07/04 PDF

CASE NO

Brian Taylor

PLAINTIFF(S) (LAST NAME, FIRST NAME, MIDDLE INITIAL)

c/o Thomas R. Breeden, PC

v.

G C Services Limited Partnership

DEFENDANT(S) (LAST NAME, FIRST NAME, MIDDLE INITIAL)

Serve RA: CT Corporation System
4701 Cox Road, Suite 285

Glen Allen VA 23060

WARRANT IN DEBT

TO DEFENDANT: You are not required to appear, however, if you fail to appear, judgment may be entered against you. See the additional notice on the reverse about requesting a change of trial location.

[] To dispute this claim, you must appear on the return date to try this case.

[X] To dispute this claim, you must appear on the return date for the judge to set another date for trial.

Bill of Particulars

ORDERED

DUE

Grounds of Defense

ORDERED

DUE

ATTORNEY FOR PLAINTIFF(S)

Thomas R. Breeden, PC

10326 Lomond Drive Manassas, VA 20109

703/361-9277; fax: 703/257-2259

ATTORNEY FOR DEFENDANT(S)

HEARING DATE
AND TIME

May 21, 2014

10:00 am

The above is a
trial of CCN's
wish to contest the
appear in court to obtain a trial date.
the date for
cases. If you
must appear on the return date.JUDGMENT PAID OR
SATISFIED
PURSUANT TO
ATTACHED NOTICE
OF
SATISFACTION

DATE

CLERK

DISABILITY
ACCOMMODATIONS
for loss of hearing,
vision, mobility, etc.,
contact the court ahead
of time.

RETURNS: Each defendant was served according to law, as indicated below, unless not found.

NAME	
ADDRESS	
<input type="checkbox"/> PERSONAL SERVICE	Tel. No.
Being unable to make personal service, a copy was delivered in the following manner:	
<input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above.	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	
<input type="checkbox"/> Served on Secretary of the Commonwealth	
<input type="checkbox"/> NOT FOUND	
SERVING OFFICER _____	
for _____	
DATE _____	

NAME	
ADDRESS	
<input type="checkbox"/> PERSONAL SERVICE	Tel. No.
Being unable to make personal service, a copy was delivered in the following manner:	
<input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above.	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	
<input type="checkbox"/> Served on Secretary of the Commonwealth	
<input type="checkbox"/> NOT FOUND	
SERVING OFFICER _____	
for _____	
DATE _____	

NAME	
ADDRESS	
<input type="checkbox"/> PERSONAL SERVICE	Tel. No.
Being unable to make personal service, a copy was delivered in the following manner:	
<input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above.	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	
<input type="checkbox"/> Served on Secretary of the Commonwealth	
<input type="checkbox"/> NOT FOUND	
SERVING OFFICER _____	
for _____	
DATE _____	

OBJECTION TO VENUE:

To the Defendant(s): If you believe that Plaintiff(s) should have filed this suit in a different city or county, you may file a written request to have the case moved for trial to the general district court of that city or county. To do so, you must do the following:

1. Prepare a written request which contains (a) this court's name, (b) the case number and the "return date" as shown on the other side of this form in the right corner, (c) Plaintiff(s)' name(s) and Defendant(s)' name(s), (d) the phrase "I move to object to venue of this case in this court because" and state the reasons for your objection and also state in which city or county the case should be tried, and (e) your signature and mailing address.
2. File the written request in the clerk's office before the trial date (use the mail at your own risk) or give it to the judge when your case is called on the return date. Also send or deliver a copy to plaintiff.
3. If you mail this request to the court, you will be notified of the judge's decision.

FORM LC 412 (PAGE TWO OF TWO) 12/01/13

I certify that I mailed a copy of this document to the defendants named therein at the address shown thereon.

DATE 5/9/14 [Signature]
☐ Plaintiff ☐ Agent
☐ Plaintiff's Attorney

Fi Fa issued on _____

Interrogatories issued on _____

Garnishment issued on _____

VIRGINIA:

IN THE GENERAL DISTRICT COURT OF LOUDOUN COUNTY

BRIAN TAYLOR,

Plaintiff,

v.

GC SERVICES, LP

Defendant.

)
)
)
)
)
)
)
)
)
)

Civil Action No. GV14001917

NOTICE OF FILING OF REMOVAL TO FEDERAL COURT

PLEASE TAKE NOTICE that a Notice of Removal (a copy of which is attached hereto as Exhibit 1) of this action from the General District Court of Loudoun County, Virginia to the United States District Court for the Eastern District of Virginia, Alexandria Division (the "Federal Court") was filed on the 9th day of May, 2014 by Defendant GC Services, LP, by counsel, with the Clerk of the Federal Court, thereby effectuating removal of this action. Pursuant to 28 U.S.C. § 1446(d), this Court shall proceed no further.

To the extent any responsive pleading is required in response to the allegations made in the Warrant in Debt of Brian Taylor, any such allegations are hereby denied.

Dated: May 9, 2014

Respectfully Submitted,



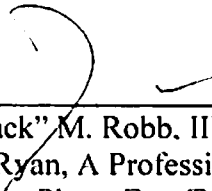
Charles M. Sims, Esq. (VSB No. 29906)
John "Jack" M. Robb, III (VSB No. 73365)
LeClairRyan, A Professional Corporation
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
Telephone: (804) 915-4138
Facsimile: (804) 916-7238
charles.sims@leclairryan.com
john.robb@leclairryan.com
Counsel for Defendant GC Services, LP

EXHIBIT B

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of May, 2014, I caused a copy of the foregoing Notice of Filing Removal to Federal Court to be served by first class U.S. Mail, postage pre-paid, on the following:

Thomas R. Breen, Esquire
Thomas R. Breeden, PC
10326 Lomand Drive
Manassas, VA 20109
(703) 361-9277 Phone
(703) 257-2259 Fax
Counsel for Plaintiff



John "Jack" M. Robb, III (VSB No. 73365)
LeClairRyan, A Professional Corporation
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
Telephone: (804) 915-4138
Facsimile: (804) 916-7238
john.robbs@leclairryan.com
Counsel for Defendant GC Services, LP